IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

JAYDEEP SHAH, M.D. M.A.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. SA-18-CA-0751-XR
	§	
TENET HEALTHCARE	§	
CORPORATION, TENET	§	
HEALTHCARE LTD., VHS SAN	§	
ANTONIO PARTNERS LLC D/B/A	§	
NORTH CENTRAL BAPTIST HOSPITAL	§	
ET. AL., GRAHAM REEVE; DANA	§	
KELLIS; and WILLIAM WAECHTER,	§	
	§	
Defendants.	§	

DEFENDANTS' JOINT CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants Tenet Healthcare Corporation, Tenet Healthcare, Ltd., and VHS San Antonio Partners, LLC d/b/a Baptist Health System d/b/a North Central Baptist Hospital (collectively, "Defendants"), hereby disclose:

- 1. Tenet Healthcare Corporation is a publicly held corporation and has no parent corporation. BlackRock, Inc., a publicly held corporation, owns 10% or more of Tenet Healthcare Corporation's stock.
- 2. TH Healthcare, Ltd. (formerly known as Tenet Healthcare, Ltd.) is an indirect subsidiary of Tenet Healthcare Corporation. There is no publicly held corporation owning more than 10% of its stock.

3. VHS San Antonio Partners, LLC d/b/a Baptist Health System d/b/a North Central

Baptist Hospital is an indirect subsidiary of Tenet Healthcare Corporation. There is no publicly

held corporation owning more than 10% of its stock.

Defendants will file a supplemental disclosure statement upon any change in the

information provided herein.

Dated: November 19, 2018.

Respectfully submitted,

/s/ Christopher A. Rogers

Christopher A. Rogers Texas Bar No. 24051264

HAYNES AND BOONE, LLP

2323 Victory Avenue, Suite 700 Dallas, Texas 75219

Tel: (214) 651-5000

Fax: (214) 651-5940

chris.rogers@haynesboone.com

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that, on November 19, 2018, the foregoing document was served upon all

counsel of record via the Court's electronic filing system in accordance with the Federal Rules of

Civil Procedure.

/s/ Christopher A. Rogers

Christopher A. Rogers